

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

MICHAEL BAINBRIDGE

Plaintiff,

vs.

MEDLINE INDUSTRIES, INC.

Defendant.

CASE NO. 5:16-cv-00555-BYP

JUDGE BENITA Y. PEARSON

**JOINT MOTION TO EXTEND DEADLINE TO FILE  
JOINT MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION  
SETTLEMENT AGREEMENT BY 7 DAYS**

Now come Plaintiffs, Michael Bainbridge, Bruce W. Ohler, Jr., Jasmine Hunt, Jesse Morales, and Defendant, Medline Industries, Inc., who hereby jointly move this Honorable Court to extend the September 13, 2016 deadline to submit the Joint Motion for Preliminary Approval of Class Action Settlement Agreement by 7 days. (*See*, Doc. No. 20). This Motion is not made for purposes of undue delay. Rather, the parties are still engaged in the drafting process, and need additional time to bring this putative settlement to finalization. An extension of 7 days will be sufficient.

DATED: September 13, 2016

Respectfully submitted,

**THE LAZZARO LAW FIRM, LLC**

/s/ Chastity L. Christy

Chastity L. Christy (0076977)  
Anthony J. Lazzaro (0077962)  
920 Rockefeller Building  
614 W. Superior Avenue  
Cleveland, Ohio 44113  
Telephone: (216) 696-5000  
Facsimile: (216) 696-7005  
Email: [chastity@lazzarolawfirm.com](mailto:chastity@lazzarolawfirm.com)

-and-

**NILGES DRAHER, LLC**

Hans A. Nilges (0076017)  
Shannon M. Draher (0074304)  
4580 Stephen Circle NW, Suite 201  
Canton, Ohio 44718  
Telephone: (330) 470-4428  
Facsimile: (330) 754-1430  
Email: [sdraher@ohlaborlaw.com](mailto:sdraher@ohlaborlaw.com)

*Counsel for Plaintiff Michael Bainbridge,  
Bruce W. Ohler, Jr., Jasmine Hunt, and  
Jesse Morales*

**TZANGAS | PLAKAS | MANNOS | LTD**

/s/ Edmond J. Mack

Lee E. Plakas (0008628)  
Gary A. Corroto (0055270)  
Edmond J. Mack (0082906)  
220 Market Avenue South, Eighth Floor  
Canton, Ohio 44702  
Telephone: (330) 455-6112  
Facsimile: (330) 455-2108  
Email: [emack@lawlion.com](mailto:emack@lawlion.com)

*Counsel for Defendant Medline Industries, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing has been filed and served electronically on the 13th day of September 2016, upon all parties currently registered for this matter in the Court's electronic filing system.

/s/ Edmond J. Mack  
Edmond J. Mack (0082906)  
*Counsel for Defendant Medline Industries, Inc.*